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and submitted online via Environmental Registry of Ontario (ERO)

To Whom It May Concern:

**RE: ERO #019-3468: Ontario's Strategy to Address the Threat of Invasive Wild Pigs**

The Ontario Federation of Agriculture (OFA) proudly represents more than 38,000 farm family members across the province, supporting our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. OFA works to ensure the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability of our farm businesses. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

OFA appreciates the opportunity to comment on the Strategy to Address the Threat of Invasive Wild Pigs as proposed by the Ontario Ministry of Natural Resources and Forestry (MNRF).

Before commenting on the specifics of the proposed Strategy to Address the Threat of Invasive Wild Pigs, OFA would like to reiterate that there is only one Ontario landscape, which means that the complete range of activities and land uses found across Ontario; natural heritage, agricultural, rural, urban, etc. must share that landscape. Inherent in this concept is the acknowledgement that Ontario's agricultural areas provide us not only with high quality, safe, affordable food, fibre and fuel, but also provide a broad range of environmental and ecological goods and services that benefit all Ontarians.

In addition, Ontario's agricultural lands are a scarce, finite and shrinking non-renewable resource. Based on census data from 2011 and 2016, Ontario's agricultural area declined by almost 320,000 acres; from 12.6 million acres to 12.3 million acres. Put in a perhaps easier to visualize

form, that is 175 acres/day. Maintaining our agricultural lands for the production of food, fibre and fuel is vital. This concept needs to be acknowledged in legislation, regulations, policies and programs.

Wild pig populations, if they become established, pose significant risks to the pork industry, and can have devastating impacts on crops, animals, native wildlife and farmer livelihood. Wild pigs could decimate Ontario's pork sector through the transmission of African Swine Fever, carried by wild pigs and transferred to domestic pig herds. All pigs, wild, pet, or otherwise outside a fence have the potential to pose a disease risk to domestic pigs. OFA believes that the negative impacts on agriculture, native wildlife, ecosystems and biodiversity warrant the development and implementation of policies and programs to curtail the population growth and spread of wild pigs across Ontario.

The proposed strategy acknowledges the threat wild pigs pose to the natural environment, agricultural industry and human health and safety. OFA supports a proactive approach and believes the best strategy to managing wild pigs is to act early. The four objectives outlined in the proposed strategy will help prevent the establishment of invasive wild pigs in Ontario.

OFA commends the MNRF on the collaborative nature of the proposed strategy; leveraging resources and expertise of different groups and stakeholders, and inter-governmental collaboration will help to achieve the goal of preventing the establishment of invasive wild pigs in Ontario. OFA supports this goal, and the core principles (prevention, early detection, and effective response and management) as outlined in the strategy.

### **Definitions**

OFA supports the proposed definitions for the strategy, including *domestic pig*, *farmed pig*, *heritage breed pig*, *Eurasian wild boar*, and *wild pig*. The language used to define these terms is clear and concise, and provide a distinction between pigs which are all members of the *Sus scrofa* species. However, the proposed strategy speaks to Eurasian wild boar *hybrids*, most notably in *Action 2.1: Phase-out the possession of Eurasian wild boar and their hybrids in captivity in Ontario*. OFA is concerned that the proposed strategy does not define what would constitute a *hybrid* of Eurasian wild boar, and could unintentionally include other breeds of domestic pigs commonly used in the pork industry. A definition for *hybrid* and more information is needed, such as what percentage of ancestry is required to be determined a Eurasian wild boar *hybrid*, how this ancestry will be determined, and the relationship between *domestic* and *Eurasian wild pigs*. OFA believes a clear and concise definition of *hybrid* is necessary, including the amount of ancestry of Eurasian wild boar needed to constitute a *hybrid*, for proper implementation of the actions and objectives listed in the proposed strategy.

### **Objective 1. Prevent the introduction of pigs into the natural environment**

#### **Action 1.1: List wild pigs as an invasive species under the *Invasive Species Act, 2015*.**

OFA supports wild pigs being included as a restricted invasive species under the *Invasive Species Act, 2015*. Including wild pigs as a restricted species under the Act would prohibit the release of any pig into the environment, and prohibit bringing a live pig into a provincial park or conservation

reserve. It will also give enforcement officers the authority to address illegal pig releases. As stated in our previous submission on [ERO # 019-1162](#) and ERO #019-3465, OFA believes this is an important step in preventing the introduction of pigs into the natural environment. The proposal combines domesticated pigs, pot-bellied pigs, and Eurasian wild boar into the same category under the Act. Wild pig populations, if they become established, pose significant risks to the pork industry, and can have devastating impacts on crops, animals, native wildlife and farmer livelihood. Wild pigs could decimate Ontario's pork sector through the transmission of diseases such as African Swine Fever, carried by wild pigs and transferred to domestic pig herds. All pigs, wild, pet, or otherwise outside a fence have the potential to pose a disease risk to domestic, farmed pigs. OFA believes that the negative impacts on agriculture, native wildlife, ecosystems and biodiversity warrant the development and implementation of policies and programs to curtail the population growth and spread of wild pigs across Ontario. OFA supports prescribing Ontario as a control zone for pigs, where in the event a pig accidentally escapes containment, the owner would need to notify the MNR immediately, and ensure the animal is recaptured or dispatched as soon as possible. Additionally, including wild pigs as an invasive species under the Act will potentially increase surveillance, as sightings can be reported through the Invading Species Hotline and the EDDMapS Ontario mapping system. Listing wild pigs as an invasive species will provide the province with additional tools to accomplish the goal of preventing the establishment of wild pigs.

**Action 1.2. Work with partners to develop, update and promote best management practices for outdoor pig containment, transporting pigs, and addressing escapes.**

OFA supports this action, and the development, updating and promotion of best management practices to prevent pigs from escaping containment. Keeping pigs contained and separated from wild animals, especially in outdoor farming operations, is critical in preventing wild pig establishment and disease transmission respectively.

OFA continues to endorse policies and programs to minimize the escape of pigs into the environment. To prevent and mitigate the risks associated with escaped pigs, OFA believes that better fencing requirements are needed for outdoor and backyard/hobby pig production. OFA recommends that the province develop regulations regarding improved fencing standards as a control measure to prevent pig escape from outdoor production operations.

The National Farm Animal Care Council *Codes of Practice for the Care and Handling of Pigs* should include fence requirements for pigs housed outdoors, similar to Ontario Pork's *Fencing for Outdoor Pig Production* guide, and the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA)'s *Fencing for Outdoor Pig Production- Protecting your Livestock and the Environment* factsheet. These two resources provide valuable information for pig producers and owners regarding the importance of fencing, and appropriate types and options. Proper fencing is critical in preventing pig escapes and as a biosecurity control measure, protecting livestock from interactions with wild animals which can lead to disease transmission. Implementing more rigid fencing requirements would reduce the risk of pigs escaping into the wild, and the risks of disease transmission, and provide authorities with the ability to inspect and enforce these requirements. Additionally, OFA recommends increased surveillance and eradication efforts, combined with regulatory standards for housing pigs for outdoor pig production to continue safely in Ontario.

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While OFA supports Action 1.2, more information is needed on how best management practices, regulatory requirements, and owner responsibilities will be conveyed to small producers, hobby farmers and companion pig owners.

**Action 1.3: Collaborate with partners to develop and deliver outreach for pig owners and producers on their obligations if a pig escape occurs.**

OFA supports this action. Owners and producers need to understand their obligations if a pig escapes, including those under the *Invasive Species Act, 2015*. However, more information is needed on how the development and delivery of this information will proceed, especially to those who are hobby farmers or companion pig owners.

**Action 1.4: Coordinate with federal and industry-led initiatives to support traceability of escaped pigs (e.g., PigTrace).**

OFA is pleased to see the traceability program PigTrace mentioned in the province's proposed strategy. Traceability programs give animal health and food safety officials the ability to trace issues to a specific location in the case of an animal health or food safety outbreak. These programs can also be useful as a tool to return pigs to owners should an escape occur. OFA supports this action.

**Action 1.5: Collaborate with partners in developing and promoting guidance for responsible pig ownership.**

OFA supports this action, however, more information is needed on how successful collaboration and transfer of information will be conveyed to pig owners, including small scale and hobby farms, and companion pig owners.

**Action 1.6: Prohibit hunting of wild pigs in Ontario.**

OFA supports prohibiting the hunting of wild pigs in Ontario. Research and management from other provinces and jurisdictions have shown that hunting of individual pigs has minimal effect on wild pig populations. Instead, hunting can scatter groups of pigs, teaches the animals to avoid hunters, and increases their reproductive rate as a response. Additionally, allowing hunting of wild pigs could potentially encourage individuals to intentionally release pigs into the wild to take advantage of hunting season. OFA supports the exception that would provide landowners or agents acting on their behalf the ability to protect their property or crops from damage by wild pigs, provided the sighting is reported. OFA acknowledges the role licensed hunters will continue to play as recognized agents in the protection of property from wildlife damage. OFA recommends communicating to the general public on how prohibiting the hunting of wild pigs is a strategic population-control policy, and not a policy against hunters.

**Action 1.7: Support municipalities, where appropriate, in determining policy and legislative actions to address wild pigs in their communities.**

OFA supports policies and legislative actions to address wild pigs in local municipalities. However, the responsibility for pigs (wild and domestic) must be maintained by MNRF and OMAFRA. Ensuring responsibility rests on provincial ministries maintains a clear regulatory and enforcement

landscape. Any municipal by-laws should complement provincial legislation, regulation, and enforcement.

**Objective 2. Address the risk posed by Eurasian wild boar and their hybrids in captivity in Ontario.**

**Action 2.1 Phase-out the possession of Eurasian wild boar and their hybrids in captivity in Ontario.**

OFA understands that the risk of Eurasian wild boar populations becoming established may be increased by the presence of Eurasian wild boar farms in Ontario. Wild pig populations have the potential to cause significant damage to agricultural crops, livestock, human and animal health, and the natural environment.

Eurasian wild boar and their hybrids are not native to North America; They are imported and raised as alternative farmed livestock for meat in Ontario. The raising and keeping of Eurasian wild boar in Ontario is a legitimate farming business. According to OMAFRA's website, 274 wild boars were processed for meat in provincially-inspected plants in 2020. Current 2021 statistics show that 65 wild boars have been processed between January and March 2021, while 82,978 other pigs have been processed. The MNRF's *Annual Report on Invasive Wild Pig Sightings: 2019-2020* analyzed wild pig sightings from the general public over the last two years. Many of the Eurasian wild boar sightings were near properties that house or farm captive wild boar. This proximity is an indicator that the sightings were most likely animals that had escaped confinement or their offspring. To mitigate the risks associated with the establishment of Eurasian wild boar and hybrid populations in Ontario, the MNRF is proposing a gradual phase-out of the importation, possession, transport, propagation, buying, selling, leasing, or trading of live Eurasian wild boar and their hybrids. OFA supports this proposal and believes that this phase-out will help Ontario avoid damages similar to those experienced in other provinces and the United States. Eradication efforts in other jurisdictions have been unsuccessful where wild boar populations have become established. Due to the potential negative risks posed to the viability of agriculture, animal and human health, and the natural environment, OFA believes it is prudent that the province be proactive in its efforts to prevent the establishment of wild pigs in Ontario.

In recognizing the potential negative impacts that Eurasian wild boar present to the agricultural sector, animal and human health, and the environment, OFA proposes an *immediate* end to the importation, possession, transport, propagation, buying, selling, leasing, or trading of live Eurasian wild boar and hybrids. To facilitate this, OFA recommends the MNRF institute a buyout program or incentive for those who are currently raising Eurasian wild boar and hybrids. A program that compensates those currently raising Eurasian wild boar and hybrids would be more economical than the cost for damages and control should they escape and become established in the natural environment. To further mitigate the risks associated with Eurasian wild boar and hybrid escapes, OFA also recommends that any new wild boar farms be prohibited immediately. As recommended earlier in this submission, a definition of *hybrid* must be clearly defined to increase clarity, and support regulatory requirement and enforcement. Consideration must be given to penalties for those who do not abide by shutdown deadlines, including confiscation and eradication of animals.

OFA supports prohibiting live Eurasian wild boar and hybrids due to the potential impacts on the viability of agriculture, human and animal health, and the natural ecosystem should they become established in Ontario. The potential risks associated with wild Eurasian wild boar populations in Ontario could be devastating, and proactive measures are needed to protect the pork sector, human and animal health, and the entire agriculture industry. While OFA believes that phasing out the farming of Eurasian wild boar and hybrids is necessary to mitigate potential risks, consideration must be given as to support to producers who are required to shut down their operations, including compensation for farm assets and value of inventory. OFA recognizes the consumer demand for game meat, and supports the import of Eurasian wild boar meat and products into Ontario for the hospitality and food market.

**Objective 3. Use a coordinated approach to remove wild pigs from the natural environment.**

**Action 3.1: Maintain reports of wild pig sightings in a central database.**

OFA supports this action, and believe a centralized database allows for a streamlined response and analysis of wild pig sightings. OFA commends the MNRF on their *Annual Report on Invasive Wild Pig Sightings: 2019-2020*. The document provides relevant stakeholders and the public information on the progression of the issue and provincial efforts to combat the problem. As in our previous submission on [ERO # 019-1162](#), OFA recommends that the MNRF's Wildlife and Research Technicians tasked with wild pig response be continued in that role, and that the MNRF continue their annual report on invasive wild pig sightings. Reporting and collection of wild pig sightings through email and online platform will aid in the detection and control of wild pigs. While we appreciate online options for sighting reports, OFA is concerned that online-only reporting is difficult for a significant number of Ontarians who do not have suitable broadband access. Access to internet in rural and remote areas of Ontario is an ongoing struggle. OFA's 2020 broadband survey showed 62% of participants had unreliable internet access. OFA recommends expanding reporting options to include a telephone number to allow rural and remote Ontarians a viable option to report wild pig sightings.

**Action 3.2: Develop and share communications to encourage public reporting of wild pig sightings.**

OFA supports this action. Continuing communication efforts by MNRF and OMAFRA will help ensure the public's continued education and involvement in wild pig reporting and control. Communications need to be clear and concise, and distributed to a variety of audiences to effectively convey the impact of wild pigs and the importance of reporting sightings. OFA recommends developing clear and consistent communications plan to achieve this objective.

**Action 3.3: Improve knowledge of the distribution, sighting frequency, characteristics (e.g., disease, genetics), and risks of wild pigs in Ontario.**

OFA supports this action. Further research is needed on sighting frequency and distribution of wild pigs, and methods to detect the presence of wild pigs in remote areas where there are fewer people to observe and report. As recommended in Action 3.1, OFA recommends a telephone number for reporting wild pig sightings to encompass those in areas where internet is unreliable or unavailable. OFA believes that more information is needed on Action 3.3, including knowledge gaps, or additional research needs.



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**Action 3.4 Undertake actions to remove wild pigs from the natural environment.**

OFA supports actions and strategies to remove wild pigs from the Ontario landscape based on research and best management practices. Research and management from other provinces and jurisdictions have shown that only certain methods in wild pig removal and eradication are viable, and that it is imperative that entire sounders are removed, rather than individual pigs. OFA believes more information is needed on the actions and protocols the MNRF is considering in removing wild pigs from the natural environment, including the role licensed hunters will play.

***Objective 4. Leverage expertise and resources by collaborating across ministries, with federal agencies, other jurisdictions, and industry stakeholders and partners.*****Actions 4.1: Ensure provincial coordination and leverage expertise.**

OFA supports this action.

**Action 4.2: As opportunities arise, contribute to federal initiatives to address the risk of invasive wild pigs in Canada.**

OFA supports this action.

**Action 4.3: Continue to share knowledge on wild pigs in Ontario and take collaborative action with relevant stakeholders, industry partners and academia.**

OFA supports this action.

OFA supports Objective 4, and the associated actions of the proposed strategy. The issue of wild pigs is a multi-faceted issue, which spans numerous industries and sectors, jurisdictions, and governments. OFA believes no single government, ministry, conservation organization or sector can address the wild pig problem alone, and that a collaborative approach is the only solution.

**Role of Hunters in Wild Pig Management**

OFA acknowledges the importance of hunters in the Ontario landscape, and in the control of wild pigs. From an agricultural perspective, wildlife can cause significant crop, livestock and poultry damage and losses. Hunting can provide a positive action that helps lessen the crop, livestock or poultry losses a farmer may face. However, research and management from other provinces and states have shown that hunting of individual pigs has minimal effect on wild pig populations. Instead, hunting can scatter groups of pigs, teaches the animals to avoid hunters, and increases their reproductive rate as a response. Additionally, allowing hunting of wild pigs could potentially encourage individuals to intentionally release pigs into the wild to take advantage of a hunting season, as has been reported in the United States. Licensed hunters however still have an important role to play in the control and eradication of wild pigs, including the protection of property and livestock and poultry from damage by wild pigs. OFA supports the role of hunting wild pigs by landowners or agents acting on their behalf to protect their property or crops from damage by wild pigs, provided the sighting is reported. Hunters also span the province, and are a welcome partner to increase the reporting of wild pig sightings in rural or remote regions of the province. OFA recommends additional information be included in the proposed strategy as to when and

how hunters will be used to assist pig owners in recapturing or dispatching of wild pigs in the event of an accidental escape.

### **Additional Considerations**

Overall, OFA supports the proposed strategy by the provincial government to address the threat of invasive wild pigs. However, OFA would like to provide the following additional recommendations:

#### *Wildlife Damage Compensation Program*

Wildlife damage imposes a significant financial burden on some Ontario farmers. Not all farmers suffer from wildlife predation equally; Impacts vary between farms and farmers. A farm's location and the characteristics of the surrounding lands play a significant role. Similarly, farm type also drives predation losses. Based on the Ontario Soil and Crop Improvement Association's 2000 *Wildlife Impact Assessment for Ontario*, subsequently updated in 2009 by the George Morris Centre, wildlife damage to both crops and livestock amounted to \$41M in 2007: equivalent to \$50M in 2019 dollars. This amount simply adjusts for inflation but does not reflect any increases in crop or livestock prices or increasing yields from new crop varieties or livestock genetics.

While Ontario does compensate farmers for livestock and poultry losses attributed to wildlife under the Ontario Wildlife Damage Compensation Program (OWDCP), there is no comparable compensation for wildlife damage to crops. Annual compensation payments for wildlife damage have ranged between \$800,000 and \$1.6 million, making the amount of wildlife damage borne by crop producers far larger than that incurred by livestock producers, and their "hurt" is further compounded by the reality that crop producers have no program compensating them for their losses equivalent to the Ontario Wildlife Damage Compensation Program. Crop Insurance only pays when yields fall below a predetermined threshold; between 70% and 90% of the farm operation's calculated Average Farm Yield. Wildlife damage to crops is rarely large enough or sufficiently extensive enough to trigger a payment. But these losses insidiously occur year after year, continually eroding farm yields and farm earnings. Profit margins for many crops are extremely slim, making 10% to 30% annual losses unsustainable. OFA recommends extending the OWDCP to include damage to crops, including damage sustained by wild pigs.

#### *Damage Awards*

Wild pigs have been shown to cause extensive damage to farms, crops, and other animals. They have the potential to spread devastating diseases such as African Swine Fever, which can cause the eradication of entire herds of pigs. OFA believes Ontario producers should be compensated for the damage caused by wild pigs to their operation, including compensation for costs associated with the eradication and disposal of wild pigs, or the losses of animals due to disease introduction by wild pigs.

#### *Enforcement*

While OFA applauds the government's efforts to prevent the establishment of wild pigs as proposed in this strategy, regulatory measures are only effective if there is adequate enforcement.



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OFA recommends effective enforcement of the measures under the proposed strategy, to prevent wild pigs from becoming established in the province.

OFA continues to support the MNR's, and its partners work to prevent the establishment of wild pigs in Ontario. We appreciate this opportunity to provide our perspective on ERO #019-3468: Ontario's Strategy to Address the Threat of Invasive Wild Pigs.

Sincerely,



Peggy Brekveld  
President

cc: The Honourable John Yakabuski, Minister of Natural Resources and Forestry  
The Honourable Ernie Hardeman, Minister of Agriculture, Food and Rural Affairs  
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